

WILMERHALE

May 27, 2015

Wayne L. Stoner

Via ECF

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Hon. Debra Freeman
Daniel Patrick Moynihan
United States Courthouse
500 Pearl St.
New York, NY 10007-1312

Re: Jay v. Spectrum Brands Holdings, Inc. et al, Case No. 1:13-cv-08137-LTS-DCF

Dear Judge Freeman:

As Your Honor directed, I respectfully write on behalf of Defendants Spectrum Brands, Inc., Spectrum Brands Holdings, Inc., and Shaser, Inc. ("Spectrum"), with the consent of Plaintiff Harvey H. Jay ("Jay"), to report that Judge Swain has issued rulings on claim construction and Spectrum's motion for partial summary judgment in this case. (dkt. nos. 88 and 89). In light of these rulings, all parties request a settlement conference with the Court. The parties have a pending request for an extension of time for discovery (dkt. no. 90), but in the meantime believe that a settlement conference may be fruitful. Accordingly, subject to the Court's schedule, the parties request that the Court schedule a settlement conference for a date in the last two weeks of June.

Respectfully submitted,

/s/ Wayne L. Stoner

Wayne L. Stoner

cc: Counsel of Record